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January 14, 2020

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Ahearn, et al. v. Islamic Republic of Iran, 20-cv-00355. (member case of *Federal Insurance Co., et al. v. al Qaida et al.*, No. 03-cv-06978 and *Ashton, et al. v. al Qaeda Islamic Army, et al.*, No. 02-cv-06977)

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's October 28, 2019 Amended Order Approving Notices to Conform, Short Form Complaints and Notices of Amendment (ECF Doc. 5234), we submit this letter on behalf of the *Ahearn* Plaintiffs, who have filed a Short Form Complaint against the Islamic Republic of Iran ("Iran") and write to request that the action be made part of this multi-district litigation (03 MDL 1570). We have also filed a Related Case Statement on the civil docket, explaining why the newly filed case is related to 03 MDL 1570.

We will be filing a motion for partial final default judgments against Iran for the *Ahearn* Plaintiffs in order to submit their applications to the United States Victims of State Sponsored Terrorism, which we hope to do on or before February 19, 2020, which is the last day for new claimants to file applications for consideration in the third round of payments.

Respectfully,

/s/ Barry Salzman

Barry Salzman

cc: All counsel via ECF